## UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF MISSOURI

EDWARD F. PLASTINO and SECOND AMENDMENT FOUNDATION, INC.,	)	
Plaintiffs,	)	
v.	)	Case No. 4:12-CV-1316
CHRIS KOSTER, in his Official Capacity as	)	
Attorney General of the State of Missouri; and TOM NEER, in his Official Capacity as	)	
Sheriff of St. Charles County, Missouri,	)	
Defendants.	)	

## **DECLARATION OF JULIANNE VERSNEL**

I, Julianne Versnel, am competent to state, and declare the following based on my personal knowledge:

- 1. I am the Director of Operations of the Second Amendment Foundation ("SAF").
- 2. SAF is a non-profit membership organization incorporated under the laws of Washington with its principal place of business in Bellevue, Washington. SAF has over 650,000 members and supporters nationwide, including in Missouri. The purposes of SAF include education, research, publishing and legal action focusing on the Constitutional right to privately own and possess firearms, and the consequences of gun control.
- 3. SAF has individual members and supporters who are adversely impacted by § 571.101.2(1) RSMo.
- 4. But for the criminal enactments challenged in this complaint, SAF members who are legal aliens residing within Missouri would obtain concealed carry permits and carry concealed firearms for their own defense, but they refrain from carrying concealed firearms for fear of arrest, prosecution, fine and incarceration.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this the 27<sup>th</sup> day of December, 2012

